

1 JAMES MATTHEW BROWN, APLC (CSB# 98922)
2 Attorney at Law
2044 First Avenue, Suite 200
3 San Diego, CA 92101
(619) 238-0815

4 Attorney for Defendant Felipe Jasso-Rios

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7 IN THE UNITED STATES DISTRICT COURT

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9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10

(HON. ROGER T. BENITEZ)

11 UNITED STATES OF AMERICA,) Case No. 08 CR 0158-BEN
12 Plaintiff,)
13 v.) DECLARATION OF JAMES MATTHEW
14) BROWN IN SUPPORT OF
15 FELIPE JASSO-RIOS,) DEFENDANT'S EX-PARTE
16) APPLICATION FOR AN ORDER
17) SHORTENING TIME TO FILE
18) DISCOVERY MOTIONS
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I, James Matthew Brown, declare as follows:

1. I am an attorney at law duly licensed to practice before the United States District Court in and for the Southern District of California. I represent the defendant, Felipe Jasso-Rios, in regard to the above referenced matter.

2. I ask the attached tardy discovery motions be filed with the court for the reasons that I have been recently inundated with work and family issues which have precluded me from filing these motions by their due date.

1 3. I was involved in a two month long trial before the
2 Honorable Judge Dana M. Sabraw in the matter of the United States of
3 America v. Raul Leon, Thomas Durkin, 06CR1243-DMS. The jury in that
4 case returned a verdict in January, 2008. As a result of my absence
5 from the office while in trial, I was so behind on all other cases
6 and with family matters that it has taken a little while to get
7 matters re prioritized. I would not want Mr. Jasso-Rios to suffer
8 due to my trial calendar.

9 4. The accompanying discovery motions are also necessary
10 because relevant information has not yet been provided by the
11 government up to this point in time.

12 4. I have been contacted Assistant US Attorney Steven De Salvo
13 and have received his approval to file these motions late.

14 5. As such, it is respectfully requested your Honor sign the
15 attached Order authorizing an order shortening time to file the
16 the referenced sentencing memorandum.

17 I declare under penalty of perjury the foregoing is true and
18 correct and would and could competently testify thereto if called
19 upon.

20 DATED: February 28, 2008 LAW OFFICES OF JAMES MATTHEW BROWN, APLC

By: S/James Matthew Brown
James Matthew Brown, APLC
Attorney for defendant
Felipe Jasso-Rios